



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Board Information

- **Board of Directors**
Engineering, Operations, and Technology Committee

7/22/2025 Board Workshop

5b

Subject

Update on research and framework for a community benefits program for Pure Water Southern California

Executive Summary

Metropolitan is exploring the development of a voluntary community benefits program for the Pure Water Southern California Program (PWSC). While not required under law, community benefit programs are increasingly recognized as best practices for large infrastructure projects, particularly those that may have residual impacts on underserved and disadvantaged communities located near project facilities. The purpose of such a program would be to complement required environmental mitigation efforts and help address impacts to the communities most affected by the program through voluntary, community-driven actions.

This letter provides an overview of ongoing efforts to explore a potential community benefits program for PWSC. It is accompanied by a supporting presentation outlining key findings from recent research and a proposed approach framework, as well as two supporting memos providing additional context and background. No funding level is proposed at this time.

Fiscal Impact

Not applicable

Applicable Policy

2025 Metropolitan Legislative Priorities and Principles: Support the development of water recycling projects, including Pure Water Southern California, to improve long-term supply reliability.

Related Board Action(s)/Future Action(s)

By Minute Item 50299, dated November 10, 2015, the Board authorized an agreement with County Sanitation District No. 2 of Los Angeles County for the development of a potential regional recycled water supply program and a demonstration project.

By Minute Item 52174, dated November 10, 2020, the Board authorized the preparation of environmental documentation and technical studies, and public outreach activities for the Regional Recycled Water Program.

Details and Background

Background

PWSC is a partnership between Metropolitan Water District of Southern California and the Los Angeles County Sanitation Districts (Sanitation Districts) to beneficially reuse cleaned wastewater that is currently being discharged into the ocean from the Sanitation Districts' A.K. Warren Water Resource Facility in the City of Carson. At full scale, PWSC would produce up to 150 million gallons of purified water each day. PWSC's proposed facilities and components would be located within Los Angeles County and would extend from the City

of Carson to as far north as the City of Azusa and as far east as the City of La Verne. Anticipated program facilities include an advanced water purification facility, conveyance pipelines, pump stations, and recharge facilities.

Metropolitan is evaluating a community benefits program as part of PWSC to help address potential impacts to local communities. The program's planned infrastructure, particularly the conveyance system, would pass through several communities identified through state screening tools as disadvantaged and underserved. A formal community benefits program would provide a structured framework for investments informed by the community. This approach builds on Metropolitan's history of community-focused efforts, including the Diamond Valley Lake Recreation program, Palo Verde Valley Community Improvement Fund, and Metropolitan's Project Labor Agreement.

Planning and Coordination to Date

In 2023, staff began evaluating the potential for a community benefits program, working in collaboration with the Sanitation Districts and with support from Kearns & West. This effort is intended to support the development of a consistent and locally informed framework approach for delivering community benefits alongside major infrastructure projects that would be part of PWSC.

Community benefits programs are voluntary initiatives that go beyond required regulatory mitigation. They are intended to help address concerns in communities, particularly in underserved and disadvantaged areas, that may experience disproportionate impacts from construction and operations by identifying investments and engagement opportunities. Demographic analysis conducted during the planning found that approximately 35-70 percent of the census tracts located within one mile of the proposed PWSC advanced water purification facility and backbone conveyance system meet state definitions of disadvantaged communities.

The proposed approach framework for the program has been informed by research, internal coordination, and early discussions with staff from Metropolitan, the Sanitation Districts, and with input from local communities near proposed program facilities

Community Benefits Program Development

Two memos support this update:

Memo 1 (**Attachment 1**) summarized findings from a review of peer agency programs, including efforts by the California Department of Water Resources, California High-Speed Rail Authority, LA Metro, and Gordie Howe International Bridge in Detroit. These examples illustrate how community benefits programs are used to address local concerns and provide lasting value in areas affected by infrastructure.

Memo 2 (**Attachment 2**) proposes a five-part approach framework specific to PWSC, shaped by community engagement, Metropolitan precedent, and additional factors. The five components are:

1. ***Regional Water Supply, Quality, and Resiliency Benefits***
Contextualizes the broader regional benefit of PWSC, particularly for communities reliant on groundwater basins enhanced by PWSC.
2. ***Community-Focused Program Design***
A commitment to incorporating equity, cultural, and community considerations into project design and construction planning.
3. ***Environmental Mitigation, Permit and Agreement Conditions, and Regulatory Compliance***
Covers required actions that will provide benefits to local communities during construction and operation.
4. ***Workforce Development and Local Business Opportunities***
Advances Metropolitan's Project Labor Agreement, Business Outreach Program, and workforce development initiatives to create access to job training, water industry careers and business opportunities.
5. ***Additional Community Benefits***
Envisions potential direct actions through Metropolitan-led projects and the creation of a community benefits

fund, with oversight from community advisory groups to ensure funding aligns with local priorities and needs.

Next Steps

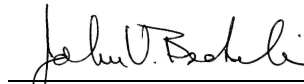
Staff will consider and incorporate board input to refine the proposed framework and begin developing potential implementation paths. Further updates will be brought to the Board as planning advances.



7/17/2025

Mai M. Hattar
Interim Chief Engineer
Engineering Services

Date



7/17/2025

John Bednarski
Assistant General Manager

Date

Attachment 1 – Community Benefits Research

Attachment 2 – Community Benefits Program Approach Framework

Ref# es12701949

Attachment 1

Summary of Desktop Research on Community Benefits Programs Pure Water Southern California



MEMO

To: Rupam Soni, Community Relations Manager
Metropolitan Water District of Southern California (Metropolitan)

From: Joan Isaacson, Principal; John Bowie, Senior Director; and Christian Mendez, Director

Date: October 23, 2023; Revised November 13, 2023, and July 8, 2025

Re: **Summary of Desktop Research on Community Benefits Programs
Pure Water Southern California**

PURPOSE

The Metropolitan Water District of Southern California (Metropolitan) is planning to embark on multiple major infrastructure projects in upcoming years and anticipates consideration of community benefits programs for them. Having an established approach framework for planning community benefits programs will help to achieve consistency, efficiency, and effectiveness as Metropolitan undertakes these important projects. Metropolitan is initiating this type of approach for a community benefits program as part of Pure Water Southern California.

While community benefits programs are an increasingly common component of major infrastructure projects, they generally lack a standardized statutory definition. Additionally, their specific components and objectives can vary widely depending on the context and project needs. The community benefits program is a concept that has evolved over time to offset adverse consequences to those communities that will experience impacts of projects that have broader societal benefits. Some federal agencies have established guidance for specific projects, but for the most part, regional and local agencies determine their own approaches and protocols for community benefits programs. Regardless of the variability, **community benefits programs typically are voluntary commitments on the part of the agencies responsible for project implementation.**

This memo provides "baseline" information about community benefits programs for use by Metropolitan in developing its approach framework for Pure Water Southern California. It provides background and examples of definitions and public agency approaches, with an expansion on the relationship between community benefits programs and the environmental review process and environmental justice considerations (see below for definition of environmental justice). Some examples and options identified in the memo could be incorporated into Metropolitan's approach framework, and/or they might spur new ideas to optimize Metropolitan's objectives and needs for community benefits programs.

About the Project Team: Kearns & West primarily provides services in stakeholder facilitation and community engagement, with a significant focus on supporting major public infrastructure projects. However, many of our team members have prior work experience in environmental review and planning. Across our projects, we have interacted with a variety of community benefits programs, reflecting an array of approaches depending on the involved public agencies and specific project needs. The research for this memo was conducted by John Bowie, Kearns & West Director, who is a licensed member of the California Bar Association and has experience as a former Commissioner on the Palo Alto Utilities Advisory Commission. John is also a former fellow at UC Berkeley School of Law's Center for Law, Energy, and the Environment and has worked on a variety of environmental and natural

resource projects, including drafting guidance for drafting joint National Environmental Policy Act/California Environmental Quality Act (NEPA/CEQA) documents for a federal agency.

TERMINOLOGY

Because a standard statutory definition of a community benefits program is not established, terminology and definitions are variable. The discussion of the terminology below is an attempt to achieve precision in Metropolitan's conversations about community benefit programs. Ultimately, Metropolitan's approach framework needs to specify the definitions that work best for the Pure Water Southern California program goals and implementation paths.

Environmental Justice

The definition of "environmental justice" can vary subtly depending on the context of its use in discussion in policy, environmental review, news media, etc. The [US Environmental Protection Agency \(EPA\) defines environmental justice](#) as the fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. EPA further defines "fair treatment" as no group of people shall bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental, and commercial operations or policies.

Equity

"Equity" is a broader term than environmental justice and often has specialized definitions by sector, such as water equity, climate equity, and economic equity. It generally refers to fairness and justice and is distinguished from equality. Whereas equality means providing the same to all, equity means recognizing that everyone does not start from the same place and requires acknowledgment and making adjustments to achieve greater balance.

Community Benefits Program/Plan

In our review of federal programs, we saw greater use of the term "community benefits plan," but in State of California programs, we saw greater use of "community benefits program." Therefore, the latter is used in this memo.

The general definition of a community benefits program – pieced from multiple sources – is a set of commitments made by the project proponent to address the adverse effects on the communities and the local environment in which they are built, recognizing that the benefits of the project are not fully experienced locally. It can be considered a blueprint for how the project will benefit the residents, businesses, and organizations within the host community. Benefits to environmental justice and underserved communities are often prioritized. While they can include mitigation required by the environmental review process and other regulatory-driven actions, the commitments often go above and beyond the regulatory requirements and address goals related to local needs like local jobs and workforce development, climate resilience, equity, and public health, based on input from local community members. These are voluntary commitments that have historically not been holistically addressed by the regulatory frameworks for project design and implementation.

Examples of project components that are typically considered different from community benefit program commitments are environmental mitigation measures, regulatory compliance measures, and permit conditions.

Community Benefit vs. "Community Benefits Program/Plan"

In our research, we often saw project features and environmental mitigation measures discussed as having community benefit or community improvement, especially when informed by a community engagement process. These are valid characterizations but substantively different than a designated community benefits program.

Community Benefit Agreement

Community benefit agreements have historical roots as contractual agreements between community benefit groups and developers, stipulating the benefits a developer agrees to fund or furnish, in exchange for project support. Benefits can include commitments to hire directly from a community, contributions to economic trust funds, local workforce training guarantees, and more. They are associated more with private developers, but public agencies are starting to use them too, such as the [California High-Speed Rail Authority Community Benefits Agreement](#) with unions and contractors. (The overarching objectives of the High-Speed Rail Authority agreement have similarities with [Metropolitan's own landmark Project Labor Agreement for Construction Contracts](#).)

A community benefit agreement(s) may become an implementation action of a community benefits program.

EVOLUTION OF COMMUNITY BENEFITS PROGRAMS

Collecting information specifically about the history of community benefits programs proved challenging, which may relate to the lack of standardized definitions and implementation protocols. Interestingly, public agencies have informally provided features for public benefit and improvement as part of major development and infrastructure projects for decades. For example, consider the common and longstanding practice of incorporating a public park in a reservoir project or in a new public library or civic center complex. Current practice for community benefits programs has shifted from this historical broad public benefit to focus on addressing environmental justice and impacts on underserved communities.

Community benefits programs are distinctly tied to the environmental justice movement, which has roots in the 1960s Civil Rights Movement and 1980s activism around the siting of a solid waste landfill in Texas and a PCB (polychlorinated biphenyls) landfill in North Carolina, both in close proximity to African American communities.

The first major federal requirement for consideration of environmental justice was incorporated in 1994 into NEPA by Executive Order 12898. In a section called Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations, the order directs federal agencies to make achieving environmental justice a part of their mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of programs, policies, and activities on minority and low-income populations, including tribal populations. The executive order establishes using the NEPA process to promote environmental justice by addressing the human health, economic, and social effects on these populations, but notably, it doesn't specifically require mitigation measures for environmental justice impacts. However, the mitigation measures for environmental impacts should reflect the needs and preferences of impacted communities, based on meaningful community engagement.

Environmental justice is not mentioned in the statutory language of CEQA, and environmental justice was not intended as a fundamental purpose of CEQA as an environmental review statute. However, CEQA is regarded as a tool for addressing environmental justice concerns as they relate to the

environmental resource areas covered under CEQA. Furthermore, the current State of California Attorney General has taken actions to implement California law that defines environmental justice as the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies. This includes ensuring that CEQA fairly addresses environmental impacts in relationship to these populations and that appropriate mitigation measures are identified and implemented.

In 2021, another federal executive order, the Justice40 Initiative¹, directed all federal agencies to develop programs, policies, and activities to address the disproportionate health, environmental, economic, and climate impacts on disadvantaged communities. Justice40 prioritizes environmental justice and ensures a whole-of-government approach to addressing current and historical environmental injustices. A cornerstone of the Justice 40 Initiative is a federal goal of delivering 40% of the overall benefits of relevant federal investments to disadvantaged communities. All Justice40-covered programs are required to engage in stakeholder consultation and ensure that community stakeholders are meaningfully involved in determining program benefits.

In alignment with Justice40, new federal programs explicitly include provisions for community benefits programs, including the following examples:

- The Department of Energy requires community benefits plans for all funding announcements and loan applications under the Bipartisan Infrastructure Law and Inflation Reduction Act. Four priorities are identified for the Community benefits plans: hiring American workers, engaging communities and labor, promoting diversity and inclusion, and implementing Justice40. Provisions allow for flexibility for innovative approaches as long as features can be measured and achieved.
- The Department of Transportation, as part of its Bipartisan Infrastructure Law Grants Program, requires Community Benefits Plans as part of all funding opportunity announcements and loan applications. Priorities for benefits include workforce investment, community engagement, diverse and equitable inclusion, accessibility, and Justice40 implementation.
- The Environmental Protection Agency's Green Infrastructure Funding Opportunities include the Clean Water State Revolving Fund, which provides low-cost financing for a wide range of water quality infrastructure projects, including stormwater and green infrastructure. Beyond the infrastructure goals, community benefits such as environmental justice, climate resilience, and public health are encouraged.

The priorities identified in the above examples represent a trend of community benefits programs that are unrelated to environmental impacts or are only loosely related to environmental impacts.

EXAMPLES

Of note, desktop research did not yield many examples of community benefits programs. There are many examples of community benefits agreements, and examples of community benefits programs in

¹The Justice40 initiative was rescinded in January 2025 by Executive Order 14148, "Initial Rescissions of Harmful Executive Orders and Actions" (Jan. 20 2025), §3 (rescinds Executive Order 14008, "Tackling the Climate Crisis at Home and Abroad," which established the Justice40 Initiative). While it is referenced in this research memo, the Pure Water community benefits framework and approach paper was updated to align with current state and federal guidance.

the medical sector were also abundant. A few resources for community benefits programs integrated into development regulations and zoning were also uncovered, but they mainly focused on requiring public improvements and facilities for properties being "upzoned" for taller, denser buildings.

Our team believes that the following examples will be interesting and potentially helpful to Metropolitan when considering the development of its approach framework for community benefits programs. Please note that some of the following examples do not entirely align with the concept of community benefits programs but are likely still of interest.

California

State of California Department of Water Resources (DWR) – Delta Conveyance Project: DWR is developing a community benefits program for the proposed Delta Conveyance Project, which will ultimately identify and implement commitments, if the Delta Conveyance Project is approved, to help protect and enhance the cultural, recreational, natural resource, and agricultural values of the Delta. Development and eventual administration of this program will be a grassroots and collaborative process with the local community. The commitments in the community benefits program can include a wide range of possible approaches, including economic and social benefits from job training programs and local hiring targets or funding for local improvement projects such as infrastructure or recreational facilities. Informational materials explain that the Delta Conveyance Project is a large infrastructure project that has broad benefits but adverse impacts on communities within proximity of the project footprint. Community engagement to date has included stakeholder interviews, community workshops, and a questionnaire. The Delta Community Fund is planned as a community-driven approach for fund management for local residents, leaders, and other participants to be directly involved in implementation.

Notes: There's no mention of equity in the overview information (potentially due to the wide range of stakeholder interests and perspectives), but there is a clear distinction between regulatory mitigation (CEQA/NEPA) and the community benefits program. Go here for helpful [Fact Sheet](#) and [Draft Community Benefits Program Framework](#).

California High-Speed Rail Authority – San Francisco to San Jose and San Jose to Merced Project Sections: Under contract to the Authority, Kearns & West, including Joan Isaacson, conducted substantial community outreach and engagement program as part of the separate CEQA/NEPA environmental review process for each section. Initial engagement solicited input for general ideas on "community benefits" for both sections. Then, the environmental team shored up their approach based on the Draft EIR/EIS analyses, which yielded different impact conclusions for each section.

The environmental mitigation for both sections was developed with substantial community input, with emphasis on the engagement of underserved and disadvantaged communities. The environmental mitigation in both documents is considered to have substantial public benefit and will help to reduce impacts in environmental justice communities.

However, the [EIR/EIS for the San Francisco to San Jose Section](#) indicates that, following the application of environmental mitigation, environmental justice communities would not be subject to disproportional impacts. The [EIR/EIS for the San Jose to Merced Section](#) indicates that, following the application of environmental mitigation, environmental justice communities would be subject to "residual" disproportional impacts. The San Jose to Merced Final EIR/EIS, therefore, includes an appendix that identifies "[proposed offsetting mitigation measures](#)," which collectively are similar to a community benefits program in theory. The appendix also documents High-Speed Rail Authority's methodology for determining the measures, cost estimates, and implementation roles.

Notes: Go here for [Board presentation slides](#).

LA Metro – West Santa Ana Branch Transit Oriented Development Strategic Implementation Plan: In order to maximize the transit investment that will be made in the [West Santa Ana Branch Transit Corridor](#) – another kind of corridor project, like a major pipeline project – and to ensure that communities along the corridor equitably benefit from the investment, LA Metro facilitated the development of a [Transit Oriented Development Strategic Implementation Plan](#). The plan was funded by the Federal Transit Administration Pilot Transit Oriented Development Project program and completed in partnership with the City of South Gate and Eco-Rapid Transit.

The Strategic Implementation Plan provides an overarching vision and strategic guidance for local West Santa Ana Branch jurisdictions to use as a reference as they develop and implement their own plans, policies, and economic development and mobility strategies in the 12 station areas along the alignment. Projects aligned with the Strategic Implementation Plan will contribute to equitable and sustainable transformation of the station areas, as well as making the areas safe and accessible via multiple modes of mobility.

LA Metro funds projects through an application process. The first two rounds appear to have provided \$1 million, allocated in awards up to \$200,000 each. Eligible funding activities specified in the Strategic Implementation Plan fall into six categories: Governance, Equitable Development & Community Preservation, Transit Supportive Planning, Placemaking, Mobility Access & Connectivity, and Sustainability and Resilience. The program includes provisions for technical assistance to applicants who may lack resources to otherwise prepare a competitive and comprehensive application.

Notes: The West Santa Ana Branch Transit Corridor involves linear infrastructure just like a pipeline project; of note is the use of a grant process to fund projects instead of direct project implementation. Go here for an [overview](#).

Elsewhere

Windsor-Detroit Bridge Authority (Michigan) – Gordie Howe International Bridge Project: The Gordie Howe International Bridge project, with Canadian and US ports of entry, will deliver much-needed transportation improvements for international travelers, and it will also provide jobs and opportunities for growth to the Windsor, Ontario and Detroit, Michigan region. A key project element is the inclusion of a Community Benefits Plan. On the Gordie Howe International Bridge project, community benefits are identified opportunities that can advance economic, social, or environmental conditions for the local communities. In developing the Community Benefits Plan, initiatives providing positive outcomes for the Windsor-Detroit region and that specifically focus on enhancing the communities of Sandwich and Delray, the neighborhoods closest to the project area, were prioritized. The Community Benefits Plan is the result of community members, agencies, and governments coming together to identify a vision of the future, and it aspires to guaranteeing that the people located most directly adjacent to the Gordie Howe International Bridge project will be among its truest beneficiaries.

The Community Benefits Plan has a twofold strategy: Workforce Development and Neighborhood Infrastructure. The Neighborhood Infrastructure had about \$15 million funding, but the funding information related to Workforce Development is more complex.

Notes: For the plan, go [here](#).

DISCUSSION POINTS FOR NEXT STEPS

For the framework approach for Pure Water Southern California, Metropolitan could explore a three-pronged approach for environmental justice and equity: 1) The already established Project Labor Agreement; 2) required environmental mitigation that has public benefit and helps to address environmental justice considerations informed by community input; and 3) a community benefits program that could address any residual impacts to environmental justice communities and achieve other equity objectives established by Metropolitan.

Metropolitan should consider an option similar to LA Metro's that consists of funding projects through a competitive application process, especially given the similar corridor footprint of LA Metro's new transit line and Pure Water Southern California. However, while Pure Water Southern California's potential impacts in the pipeline corridor will primarily occur during construction, LA Metro's new transit line will have impacts during construction and during the many years of operation.

The [City of Toronto's Community Benefits Framework](#) is far more than what's needed by Metropolitan, but it might provide ideas on how to combine different types of programs into a single consistent approach.

Because Metropolitan is pursuing federal grant funding for Pure Water Southern California, the specific grant programs should be reviewed for requirements and guidance on incorporation of community benefits. For example, Metropolitan recently submitted an application for the Department of Interior/Bureau of Reclamation WaterSMART: Large-Scale Water Recycling Projects funding program. The WaterSMART program is a "covered" program under Justice40, President Biden's Executive Order that aims to ensure 40 percent of the overall benefits of certain climate, clean energy and other federal investments flow to disadvantaged communities that have been marginalized by underinvestment and overburdened by pollution. Go here for [information about Justice40](#), including requirements for the covered programs.

Attachment 2

Pure Water Southern California
Approach for Community Benefits Program



Metropolitan Water District of Southern California

Pure Water Southern California

Approach for Community Benefits Program

7/8/25

1. Introduction

The Metropolitan Water District of Southern California (Metropolitan) is considering major infrastructure projects in upcoming years with the aim of ensuring that its system is resilient and can readily adapt to climate change and evolving water supply conditions. A component of these projects could involve providing certain benefits to the communities most affected by such projects, including those that are considered underserved and disadvantaged.

This paper recommends an approach for assessing and planning for community benefits as part of Pure Water Southern California (Pure Water), a program currently in the planning and environmental review stages, in preparation for approval consideration by the Metropolitan Board of Directors. This program would entail purifying and reusing cleaned wastewater that currently flows into the ocean from the A.K. Warren Water Resource Facility located in Carson, California, which is owned and operated by the Los Angeles County Sanitation Districts (LACSD).

At full scale, Pure Water would produce 150 million gallons of purified water each day, which would be used to recharge the groundwater aquifers that serve as a drinking water supply for the region. Additionally, this purified water would be used for some non-potable applications and could provide new source water for Metropolitan's existing treatment plants. Metropolitan is partnering with LACSD on Pure Water, and they have discussed the possibility of partnering on this community benefits program as well.

Methodology

The recommended approach documented in this paper is the result of a collaborative process involving Metropolitan and LACSD staff and Pure Water consultant team members. Kearns & West supported research, process facilitation, and report writing, including this paper. The first step involved discussing "baseline" information about other community benefits programs, including their histories, definitions, and examples as summarized in Memo #1¹. The next step consisted of reviewing and soliciting feedback on components for the approach during a series of meetings with individual staff members as well as groups of Pure Water program staff, as listed in the Attachment. The third step of documenting the approach is accomplished in this paper.

Contents

This paper is organized in four sections:

- **Section 1, Introduction:** Overviews the overarching purpose of Pure Water's community benefits program.
- **Section 2, Objectives:** Establishes recommended objectives for the community benefits program.
- **Section 3, Context Factors:** Provides background information on related Metropolitan programs, federal and state policy, funding drivers, and underserved and disadvantaged communities across the Metropolitan service area and in the vicinity of the program area.

¹ Memo #1 was summary of desktop research on community benefits programs, terminology, examples, and additional considerations. Memo #1 was produced by the Kearns & West team.

- **Section 4: Recommended Approach:** Lays out the recommended approach and descriptions of its five components: Pure Water's Regional Water Supply, Quality, and Resiliency Benefits; Community-Focused Program Design; Environmental Mitigation, Permit and Agreement Conditions, and Regulatory Compliance; Workforce Development and Local Business Opportunities; and Additional Community Benefits.

2. Objectives

Metropolitan's purpose in considering community benefits as part of Pure Water is to address the long-term impacts of operations as well as significant construction impacts to local communities. These communities may benefit from water supply enhancements from the projects themselves, investments necessary for regulatory compliance, and additional programs intended for areas affected by project construction and operations. However, there may be more that can be accomplished through a formal community benefits program with the following objectives:

- Consider communities that may experience impacts from the program relative to the benefits provided to the wider region.
- Recognize that community members are experts about the conditions, needs, priorities, and goals in their areas, and use their input in determining effective actions that reduce program effects and contribute to local sustainability.

3. Context Factors

This section overviews various factors that have informed the community benefits program for Pure Water.

Metropolitan Precedents

Metropolitan has a long history of incorporating community projects and funding into major infrastructure programs, recognizing that the effects on local communities would not be offset by the program's regional benefits. Two are described below:

- **Diamond Valley Lake (DVL):** When the 810,000-acre-foot reservoir was constructed by Metropolitan between 1995 and 2000, an array of recreational opportunities for local and regional communities were integrated into the program. The amenities included on-water activities such as boating, fishing, canoeing, kayaking, and sailing; adjacent multi-purpose trails; bike paths; a public park; 2.5 miles of shoreline fishing; a marina, and concession area. Planning was accomplished collaboratively with other agencies servicing the region. Metropolitan's involvement continues as part of a 2017 agreement that includes an Implementation Committee with the other agencies and stakeholders for the purposes of securing funding and continuing the planning to enhance the recreational amenities. The DVL Recreation Program is a unique appropriation. It was funded with \$92.8M in 2004 and \$4.5M was added in 2021.
- **Seasonal Land Fallowing Partnership with Palo Verde Irrigation District:** In 2005, a 35-year agreement was implemented to pay farmers to refrain from irrigating between 7 and 28 percent of land in the Palo Verde Valley at Metropolitan's call, making water available for Metropolitan's service area. Metropolitan established a \$6 million Community Improvement Fund that is managed and administered by a Board of Directors to support community improvement programs, small business development and workforce training in the Palo Verde Valley. As of 2018, the Community Improvement Fund Board of Directors awarded 45 public benefit grants totaling \$1.7 million. The Board includes local citizens as well as local agency and Metropolitan representatives. The Board's

stated purpose for the fund is to, “Effectively oversee and utilize the mitigation funds allocated by Metropolitan for the purpose of mitigating the adverse effects of the Program on the Palo Verde Valley region by supporting economic growth in the Palo Verde Valley.” The areas of interest identified in the purpose statement are economic development, community development, job creation, and related vocational training programs to enhance Palo Verde Valley communities. Building on this commitment, in February 2025, the Board voted to join with Palo Verde Irrigation District to contribute up to \$8 million for a community improvement program funded by federal grants to support business development, public health, schools, public safety and other projects.

Metropolitan’s Project Labor Agreement

In 2022, Metropolitan established a landmark Project Labor Agreement. It covers about 90 percent of Metropolitan’s anticipated Capital Investment Plan projects, and ensures fair wages, provides new opportunities for workers in the service area to be part of the building and construction, and helps grow the small business community. Metropolitan views building a diverse and qualified workforce as critical. The Project Labor Agreement creates a Construction Careers Pipeline Program to support local and transitional workers. It includes recruitment and outreach focusing on equity and diversity, training, career placement, worker support and retention, and tracking progress on local worker and transitional worker goals. The employment goal for local workers is 60 percent – the highest in the region. The goal for transitional worker engagement is 15 percent on construction projects, also the highest in the region, aiming to employ workers who come from potentially at-risk situations due to various circumstances in their backgrounds.

Metropolitan’s Diversity, Equity, and Inclusion Framework and Goals

In 2023, Metropolitan established a framework and goals for diversity, equity, and inclusion, which can help inform the approach for a community benefits program for Pure Water. The framework and goals shown in **Figure 1** address the agency’s existing and future workplace; water planning, conveyance, and delivery; and communication and connection with underserved communities and nontraditional partners.



Figure 1: Metropolitan’s Strategic Diversity, Equity, and Inclusion Framework.



Climate Adaptation Master Plan for Water

The Climate Adaptation Master Plan for Water (CAMP4W) includes equity as a central component of Metropolitan's climate resilience strategy. CAMP4W recognizes that addressing climate impacts requires ensuring that frontline, underserved, and historically underrepresented communities are engaged and considered in project planning and benefit distribution. Equity is reflected across CAMP4W's Policy Framework, Climate Decision-Making Framework, and Evaluative Criteria, which guide how projects and programs are assessed and implemented. Key attributes in assessing equity include community engagement, community benefits, broad community support, and a focus on underserved populations. A community benefits program can directly advance CAMP4W goals by helping ensure that climate resilience investments also result in meaningful, measurable benefits for the communities most impacted by environmental and infrastructure challenges.

Underserved and Disadvantaged Communities in Metropolitan's Service Area and Near Program Infrastructure

The California Department of Water Resources defines disadvantaged community households as those whose household income is 80 percent or less of the statewide median household income level and severely disadvantaged communities as those with 60 percent or less of the statewide median household income level, based on US Census 2020. The following sections provide information about the disadvantaged communities in the Metropolitan Service area that will benefit from Pure Water Southern California and the disadvantaged communities in the vicinity of program infrastructure to be constructed and operated.

Metropolitan Service Area

Using this definition and based on analysis by staff, 30 percent of the Pure Water program area is designated as a disadvantaged community. The program area is the combined service areas of member agencies that would be direct recipients of water from the full-scale program. These member agencies would receive water supplies through groundwater replenishment and/or raw water augmentation from the Weymouth and Diemer Water Treatment Plants. **Figure 2** shows the distribution of disadvantaged and severely disadvantaged communities in the service area and in relationship to the Pure Water facilities and backbone pipeline.

CalEnviroScreen uses environmental, health, and socioeconomic information to produce scores for every census tract in the state. An area with a high score is one that experiences a much higher pollution burden than areas with low scores. Communities with CalEnviroScreen scores of 75 percent or above are considered disadvantaged per state guidelines. Based on CalEnviroScreen 4.0 data, approximately 40 percent of the Pure Water program area is disadvantaged. **Figure 3** shows the distribution of disadvantaged communities identified using CalEnviroScreen. **Figures 2 and 3** together show the underserved communities in the program area that would benefit from the purified water resulting from Pure Water.

Near Program Infrastructure

Another consideration are the communities located along or within the vicinity of the proposed facilities and backbone pipeline alignment who will experience effects of construction. Approximately 35 percent of the population that is within one mile of the proposed advanced water purification facility and 39-mile backbone conveyance system falls within disadvantaged communities as identified by the Department of Water Resources and 71 percent is disadvantaged as identified by CalEnviroScreen. Those communities near the proposed facilities in the Carson area may also experience effects from operations. Using the CalEnviroScreen data, much of Carson, where many facilities would be located, ranks in the highest percentile of disadvantaged communities.

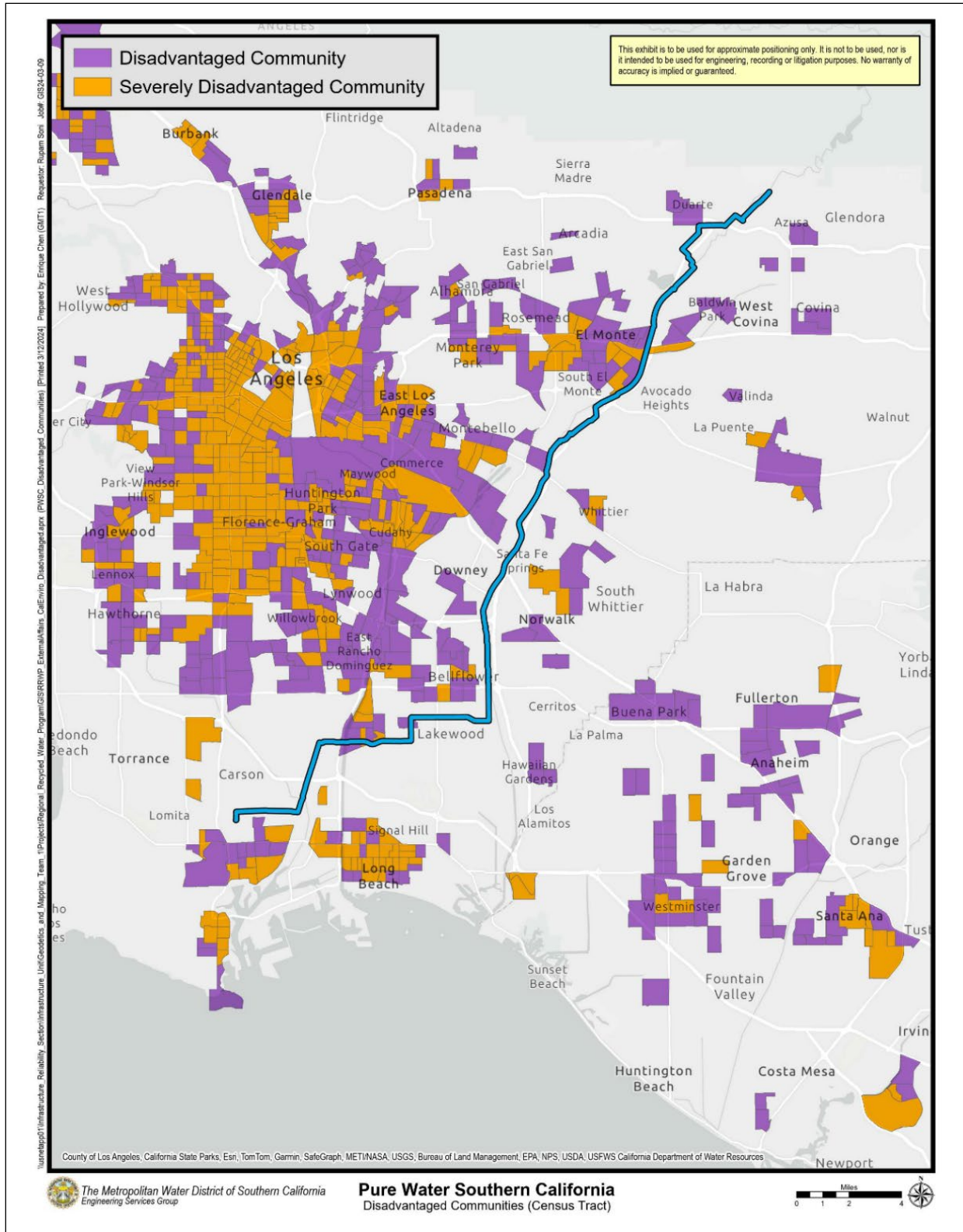


Figure 2: Disadvantaged and Severely Disadvantaged Communities in Metropolitan Service Area from California Department of Water Resources.

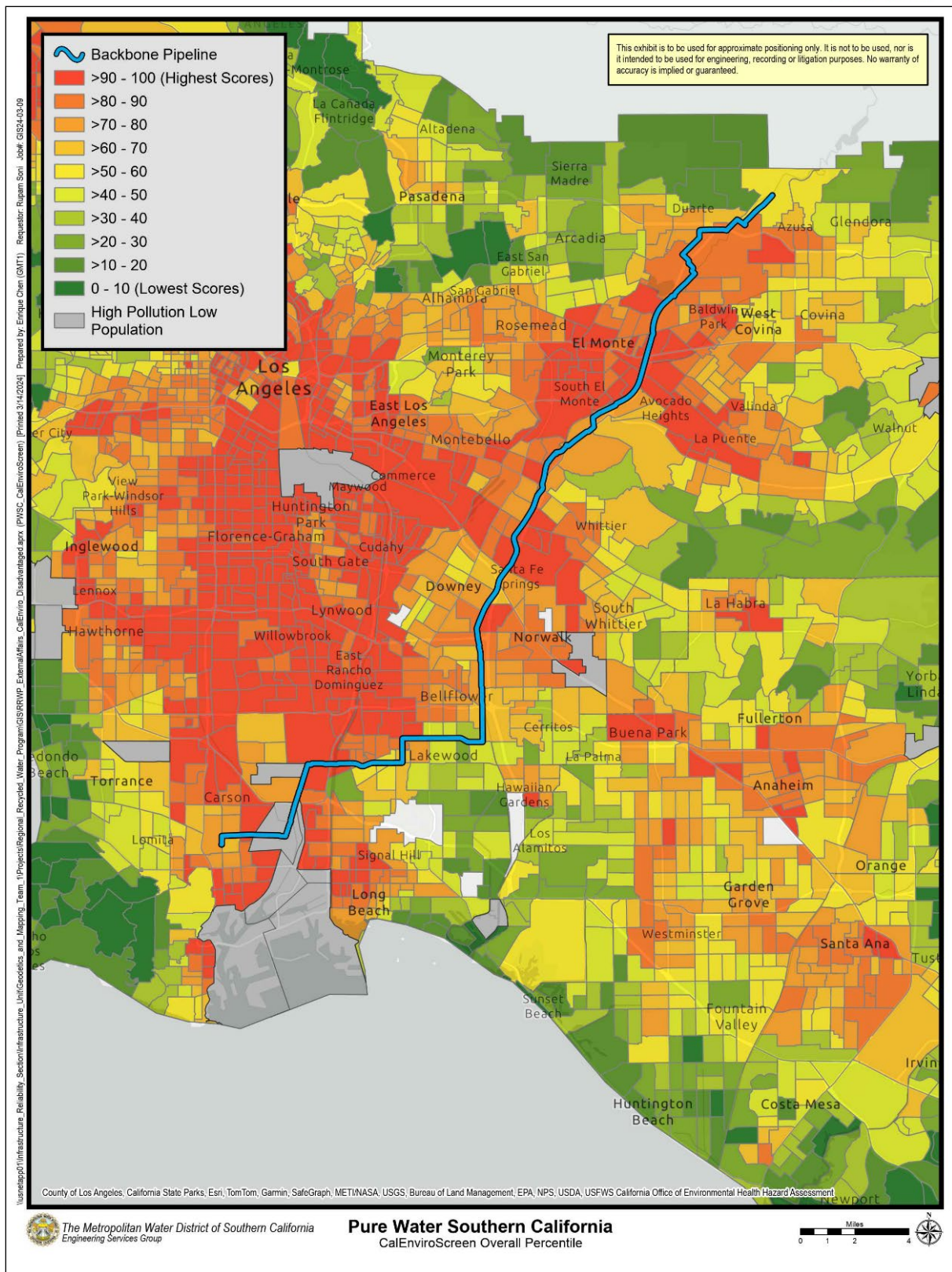


Figure 3: Disadvantaged Communities from CalEnviroScreen (75% or Higher Scores).



4. Recommended Approach

The framework of Metropolitan’s recommended approach to community benefits is shown in the diagram in **Figure 4**. Importantly, each component is influenced by the many types of engagement with community members and other stakeholders conducted by Metropolitan and LACSD. Descriptions of the five components follow the diagram.

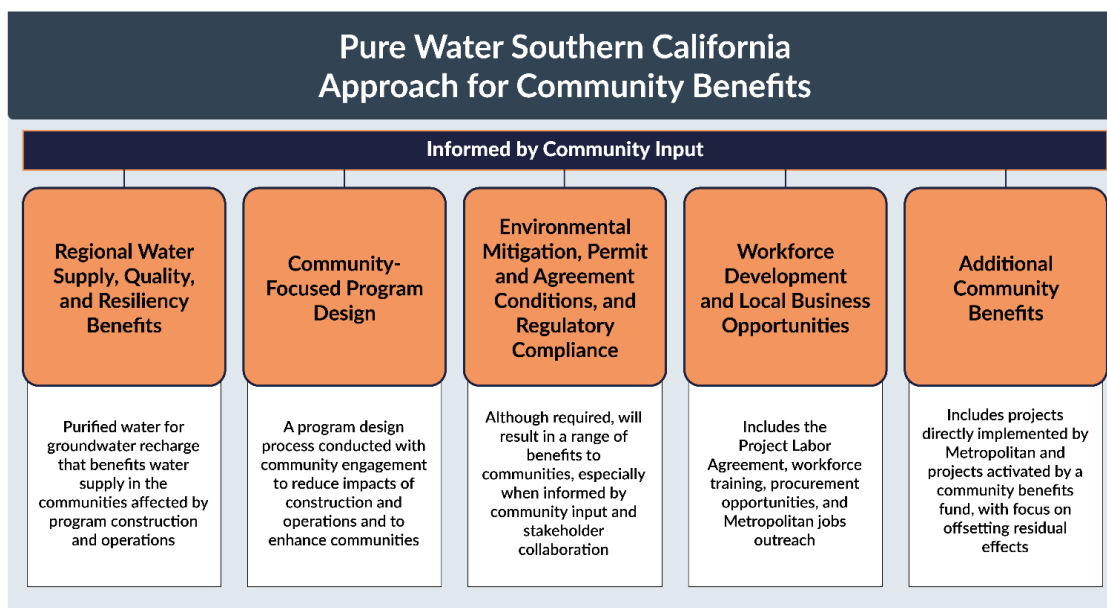


Figure 4: Proposed Approach for Community Benefits.

Regional Water Supply, Quality, and Resiliency Benefits

This first component of the approach addresses Pure Water’s substantial regional benefits in relation to water supply, quality, and resiliency. The communities across the Metropolitan service area, particularly those located along or near the Pure Water proposed facilities and pipe alignment, will share in these water-related benefits.

These benefits were outlined in a recent funding application as follows:

“Many identified disadvantaged community areas are concentrated in areas where the primary source of water supply is groundwater, especially in the Central and West Coast groundwater basins. Potable reuse projects such as Pure Water produce water low in total dissolved solids (TDS), which would improve groundwater water quality in terms of lowering TDS, nitrate, sulfate, and chloride concentrations. These improvements would help with the long-term salt balance for the groundwater basins, protecting public water supply and the health of the communities that depend on these basins. Pure Water will help support groundwater aquifers in the service area by augmenting groundwater levels with purified water, thus providing water supply reliability.”

Community-Focused Program Design

The second component of the approach is the community-focused design process for Pure Water. Metropolitan’s process has been guided by the premise that while infrastructure primarily is driven by engineering parameters, its impact on equity, culture, and community fabric should also be considered during design and construction. Work in this area is already beginning. Metropolitan’s engineering, planning,

and design teams and their LACSD counterparts have conducted extensive studies to explore alternatives and options for reducing the impacts of construction and operations. An essential part of these studies has been sharing preliminary drawings with local municipal staff and community leaders to hear feedback and ideas. This input is being considered to fine-tune the studies, create new alternatives, and advance the alternatives that indicate the greatest potential for the lowest levels of disruption.

Environmental Mitigation, Permit and Agreement Conditions, and Regulatory Compliance

The third component refers to the many actions that Metropolitan will be obligated to implement. One example is the mitigation required as part of environmental review to address potentially significant impacts. Another example is the many conditions that local agencies will attach to permits to allow construction in street rights-of-way, parks, and other places within their jurisdiction. Metropolitan may also enter into agreements with local agencies and the agreements would likely have conditions that Metropolitan will be required to meet. Compliance with federal and state environmental and health regulations pertaining to construction and operations will also result in mandatory actions for Metropolitan. Many of these required actions will result in various kinds of benefits in underserved areas.

Workforce Development and Local Business Opportunities

The fourth component is the collection of actions aligned with Metropolitan's commitment to local jobs, workforce development, and business opportunities. More specifically, this component advances objectives to increase the number of local and underserved community members who take part in Pure Water construction jobs, to provide workforce training for water/wastewater treatment jobs, and to generally increase awareness about, and access to, the wide range of jobs in the water industry, including jobs at Metropolitan. This component has four prongs:

- Project Labor Agreement (described above)
- Planned workforce training center in Carson for career paths both specific to Pure Water and across the broader water supply, treatment, and management sectors
- Diverse and equitable procurement opportunities, with provisions for local business participation through Metropolitan's Business Outreach Program
- Ongoing outreach about Metropolitan jobs and career paths

Additional Community Benefits

The fifth component is the additional community benefits in areas along and within the vicinity of the proposed facilities and pipeline alignment, prioritizing those communities that are likely to be most adversely affected, including those that are identified as underserved and disadvantaged. These are the additional actions from what may be required under other laws, rules, and regulations. These communities may experience environmental impacts of a program that benefits the wider region, and these effects may exacerbate historic and current environmental and health conditions. Some of these impacts may consist of "residual environmental effects," which refer to impacts identified during environmental review that may not be completely eliminated or avoided by the identified environmental commitments and required mitigation.

Additionally, the Envision framework², which Metropolitan intends to seek verification for, points to additional considerations, especially the Wellbeing and Community standards:

- **Wellbeing:** As integral parts of the community, sustainable infrastructure projects address individual comfort, safety and health. During construction and operation, physical safety of workers

² Envision is a framework developed by the Institute for Sustainable Infrastructure that encourages systemic changes in the planning, design, and delivery of sustainable, resilient, and equitable civil infrastructure through education, training, and third-party project verification.

and residents are ensured, and nuisances minimized (including light pollution, noise, and vibration). These components align to heighten the community experience.

- **Community:** It is important that the project maintain or enhance strong and cohesive communities. While infrastructure primarily is driven by engineering parameters, its impact on equity, culture, and the community fabric should also be considered during design and construction. The qualities and boundaries of what constitutes the affected community may vary depending on whether the project is located in a rural or urban setting. It is always important to consider the project's collective impact on society.

Two types of programs may be included in the Additional Community Benefits component: Direct Actions and Community Benefits Fund(s).

Direct Actions

Direct actions refer to projects that Metropolitan would directly fund and implement. Like all community benefit actions, the direct actions would be informed by community input. Direct actions could focus on reducing residual environmental effects from program construction and operations. They could also implement other Metropolitan goals for community benefits.

Community Benefits Fund(s)

A community benefits fund is a strategy for an agency to invest in community benefits and rely on community members to distribute the funding in ways that they believe will have the greatest positive impact and meet their communities' needs and goals. Projects funded would need to have a direct tie to the Pure Water program. The fund could be set up to optimize equitable involvement of affected communities and allocation of the funds in ways that help to achieve Metropolitan's goals for community benefits as well as community goals. Most community benefit fund programs include a community advisory committee comprised of a range of local interests. The community advisory committee typically then takes applications for projects and determines funding eligibility and amount based on alignment with established criteria. Project implementation is then conducted by applicants.

For Pure Water, having multiple advisory groups with their own funding allocations could help to achieve balanced investment in projects in underserved areas near the proposed facilities and backbone pipeline alignment. For example, community advisory groups could be established for the Carson area near the treatment facilities, for the Long Beach area where significant pipeline construction may occur in street rights-of-way and parks, and for the San Gabriel River corridor where pipeline construction may largely occur parallel to the river.

While the community advisory groups make the ultimate decisions about funding, the agreements establishing the funds and the advisory group responsibilities can set forth guidance. Potential guides for community advisory groups' funding allocations include (in addition to their own) prioritizing projects that:

- Benefit underserved communities
- Are informed by input from local community members
- Address residual effects identified during the Pure Water environmental review process
- Have multiple benefits related to jobs and workforce development, climate change preparation and resiliency, health, and/or quality of life
- Involve community members in workforce education and training, especially for jobs in water/wastewater agencies
- Are geographically dispersed

Attachment: Metropolitan, LACSD, and Consultant Participants

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